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HOGAN & HARTSON
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DAVID L. SIERADZKI
COUNSEL
DIRECT DIAL (202) 637-6482
INTERNET DS0@DC2.HHLAW.COM

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910

March 8, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, D.C. 20554

**Re: Western Wireless Petition for Designation as an Eligible
Telecommunications Carrier and for Related Waivers to
Provide Universal Service to the Crow Reservation,
Montana; CC Docket No. 96-45, DA 99-1847**

Dear Ms. Salas:

On behalf of Western Wireless Corp. and the Crow Tribal Council, I am submitting for the record in this proceeding a letter to Chairman Kennard from Clara Nomee, Chairwoman of the Crow Tribal Council, asking the Commission to immediately grant Western Wireless' petition for designation as an eligible telecommunications carrier ("ETC") on the Crow Reservation. In the letter, Chairwoman Nomee, on behalf of the Crow Tribe, reports that 65% of the Indian households on the reservation are without telephone service, based on a door-to-door survey of all Indian residents on the reservation conducted by the tribe over the past year or two. The tribe submits that a rapid FCC grant of Western Wireless' ETC petition could make a real difference in improving the availability of service to Indian citizens on the reservation. Such action would help the tribe help themselves to obtain the opportunity for competitive, affordable wireless telephone service on its reservation.

This letter and an article from American Indian Report on "Bridging the Telecommunications Divide in Indian Country" (also attached) were presented to FCC staff during a series of *ex parte* presentations made to FCC staff members yesterday by representatives of Western Wireless and the Crow Tribal Council. Participants in these meetings included Sam Painter, general counsel for the Crow Tribal Council; Gene DeJordy, Vice-President of Regulatory Affairs, Western

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Magalie Roman Salas

March 8, 2000

Page 2

Wireless; Ambassador Charles Blackwell of the Chickasaw Nation and consultant to Western Wireless; and Ronnie London and the undersigned, counsel to Western Wireless.

FCC staff members attending these presentations included Dorothy Attwood, legal advisor to Chairman Kennard; Adam Krinsky, legal advisor to Commissioner Tristani; Katherine Schroder, Deputy Chief, Accounting Policy Division, Common Carrier Bureau (APD/CCB) and Lisa Boehley, Mark Nadel, and Richard Smith of the APD/CCB staff; Mark Rubin, legal advisor to the Chief, Wireless Telecommunications Bureau ("WTB"), Rachel Kazan, Chief, Auctions Finance & Market Analysis Branch, Auctions & Industry Analysis Division, WTB, and Jose Ochoa of the WTB staff; and Eric Jensen, Deputy Director, Office of Communications Business Opportunities.

If you have any questions, please contact me.

Respectfully submitted,

A handwritten signature in cursive script, reading "David L. Sieradzki".

David L. Sieradzki
Counsel for Western Wireless Corp.

Enclosures

cc: Dorothy Attwood
Adam Krinsky
Katherine Schroder
Lisa Boehley
Mark Nadel
Richard Smith
Mark Rubin
Rachel Kazan
Jose Ochoa
Eric Jensen



Crow Country

CROW TRIBAL COUNCIL

P.O. Box 159
Crow Agency, Montana 59022
(406) 638-2601

Clara Nomee, Madam Chairman
Joseph Pickett, Vice-Chairman
Dennis Big Hair, Secretary
Cornelius Little Light, Vice-Secretary

March 3, 2000

Mr. William Kennard, Chairman
Federal Communications Commission

Dear Mr. Kennard,

The Crow Tribe respectfully requests that the Federal Communications Commission immediately proceed to overcome the impediments for using federal support for the provision of wireless telecommunications on the Crow reservation. As a domestic sovereign nation, the Crow Tribe is guaranteed the right to self-government and to the exercise of certain inherent sovereign regulatory jurisdiction over our members and our lands. We feel it is incumbent upon the FCC to work with the Crow Tribe to ensure certainty and consistency between federal and tribal laws for the provision of wireless carrier telecommunications services on our reservation trust lands by granting Western Wireless' petition for ETC status on our reservation.

Statutory language in section 214(e)(6) of the Communications Act, as amended, provides clear authority to the FCC to grant ETC status to telecommunications carriers, including wireless carriers, such as Western Wireless to facilitate access to telecommunications services on Indian lands. Section 214(e)(6) provides for ETC designation of carriers not subject to state commission jurisdiction and states, in relevant part:

In the case of a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State commission, the Commission shall upon request designate such a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by

the Commission consistent with applicable federal and State Law¹

Thus, the elements of Section 214(e)(6) which trigger ETC designation by the FCC are: (1) common carrier status, (2) provision of the telephone exchange service and exchange access, and (3) lack of a state commission's jurisdiction over the carrier. The Crow Tribe feels that the Western Wireless Corporation petition meets these requirements.

As a reminder about the urgency of our request 65% of the Indian homes on our reservation do not have telephones. We presently have three wire carriers for the six communities on our reservation and the average monthly charge for wire line basic service, without extras/ exclusive of long distance, is \$39. The average household income is \$4200 and the unemployment rate is 61%. Reliable and affordable good telecommunications is essential for the economic security of our reservation.

For over two years now, the Federal Communications Commission has focused specific attention on increasing telephone service on rural American Indian reservations. Beginning with the tribal consultations and internal education you conducted, we are most pleased. We are supportive of your efforts and we trust you will be supportive of ours.

On January 29, 1999, the FCC held the first of two field hearings on the matter of addressing the problems of the absence or underservice of telephone service on American Indian tribal lands and reservations. This Albuquerque hearing was followed by a second hearing in Chandler, Arizona, on March 23, 1999. Both hearings brought together tribal officials, interested telecommunications companies and state and federal regulatory authorities. Tribal leaders addressed the kinds of telecommunications services they wanted and needed; all the parties addressed how they could work together to improve access to such services on tribal lands. The FCC's initiative in bringing about these hearings was praised by tribal leaders and industry alike.

Recently, the Commission took the further step of adopting a Notice of Proposed Rulemaking (NPRM) on "Extending Wireless Telecommunications Service to Tribal Lands" and a further NPRM on "Federal-State Joint board on Universal Service: Promoting Deployment and Subscribership in Unserved and Underserved Areas, including Tribal and Insular Areas." Again, we applaud the FCC for focusing the attention of the telecommunication industry on the low telephone penetration rate on so many tribal reservations.

On behalf of Indian Country, the Crow Tribe requests that the FCC quickly take formal and definitive measures designed to improve the availability of service to Indian

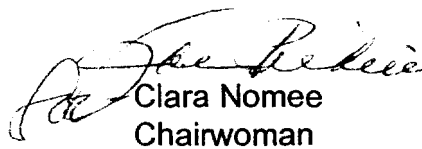
¹47 U.S.C. Section 214(e)(6) (emphasis added).

citizens living on reservations. While decisions of the NPRM or further NPRM have not been made we urge your most expeditious treatment of all these general matters.

For our people on the Crow Reservation we specifically request positive and urgently expeditious action by the FCC on the petition of Western Wireless Corporation (submitted to you on August 4, 1999) which seeks eligible telecommunications carrier (ETC) status to provide service to Crow tribal reservations lands within the context of the universal service subsidy program. This is extremely important to us. We have met with Western Wireless and Western Wireless has our tribal support. We have our quarterly general Tribal Council meeting on April 8 and I would like to tell the Crow people you have granted ETC status to Western Wireless for our reservation.

Help us help ourselves. Help us have the opportunity for competitive, affordable wireless telephone service on our reservation.

Thank you.


Clara Nomee
Chairwoman

cc: J. Stanton
Senator McCain
Senator Burns
Charles Blackwell

A M E R I C A N

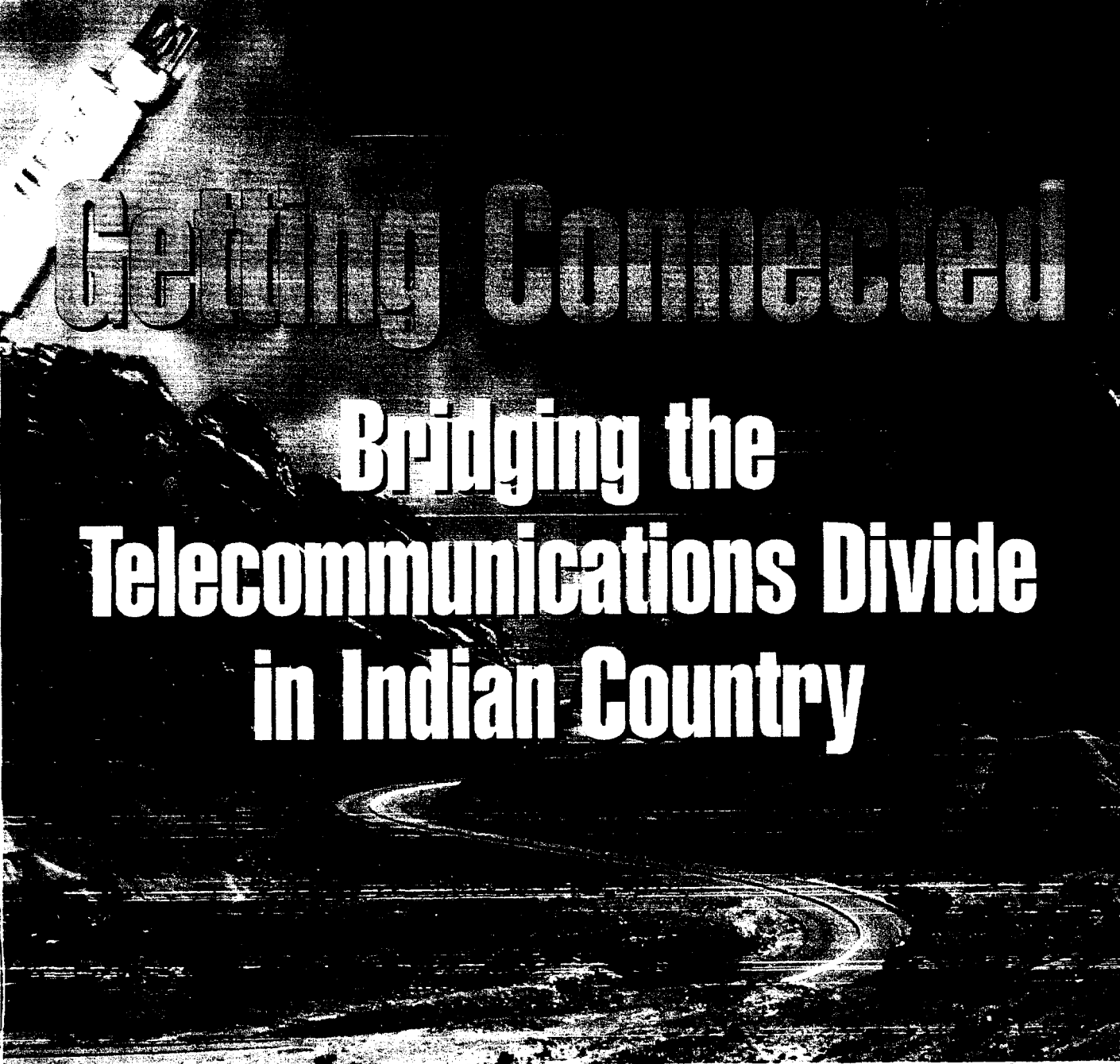
MARCH 2000

INDIAN REPORT

Indian Country's News Magazine

**HUD Defends Record
on Pine Ridge**

**Apache Hope for
Fort Sill Restitution**



Getting Connected

**Bridging the
Telecommunications Divide
in Indian Country**

Table of Contents



NATIONAL

8 Hud's Headache:

Agency's Solution to the Housing Crisis on Pine Ridge Comes Under Fire

By Jeff Hinkle

When President Clinton made his historic visit to the Pine Ridge Indian Reservation in South Dakota last summer he pledged to see to it that 50 new houses would be built there as a first step towards solving the tribe's housing crisis. Now the administration's lofty goals have come under fire.

COVER STORY

12 Getting Connected: Bridging the Telecommunications Divide

By Rea Howarth

Tribal governments have worked hard to get their governmental offices and local schools into the Internet age, but finding the talent and the money to develop the infrastructure necessary to make telecommunications advances work for them is a complicated task. A look at what tribal organizations and federal agencies have been doing to solve the problem.

ECONOMIC DEVELOPMENT

18 Best Practices: A Taxing Township

By Shelley Swift

Though it once seemed like a distant dream, Kayenta on the Navajo Nation is a thriving township generating operating revenue from retail and construction taxes.

20 Tapping Into International Tourism

By Quanah Crossland Stamps

The allures of reservation communities with pristine wilderness, open spaces, wildlife, recreation, gaming, native foods, culture and art are irresistible to Europeans and Asians, presenting significant opportunities for economic growth for tribes and tribal businesses.

COMMUNITY

22 Law: Fort Sill Imprisonment Legacy

By Deborah DuBrule

Apache hope for restitution and land as closure on an ugly chapter of federal and tribal relations.

24 Education: Pressing the Issue

By Mary Pierpoint

Haskell Indian Nations University has earned a modern-day reputation educating Indian people and defending their cultural rights. Now it finds itself on the wrong side in a public relations battle being fought in the local newspaper.

26 Land: Land Dispute Nears and End

By Randi Hicks Rowe

Evictions loom for Navajo and Hopi living on partitionland in the latest development in a century-old land dispute.

DEPARTMENTS

3 Newsbites

4 Spotlight

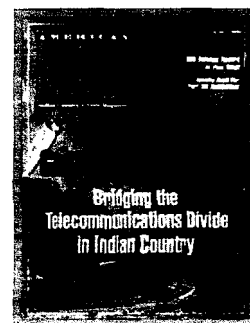
10 Fedwatch

20 Eye on Enterprise

29 Perspectives

On The Cover

Design by Ed Felker



Getting Connected

Bridging the Telecommunications Divide

By Rea Howarth

TRIBAL GOVERNMENTS HAVE worked hard to get their governmental offices and local schools into the Internet age, but finding the talent and the money to develop the infrastructure necessary to make telecommunications advances work for them is a complicated task.

For example, there are tribal schools equipped with computers but they have too few telephone lines to be able to link up to the Internet, or their wiring isn't capable of supporting the high speed video transmissions necessary for conducting distance learning in classrooms. Or the wiring and computers may be in place, but the teachers don't know how to use them. Or tribal communities get all the bells and whistles that upgraded wireline telephone fiber optics and high speed data transmission lines can provide, but subscribers still face exorbitant toll charges for calls to nearby towns.

The biggest problem of all, however, is that far too many reservation households don't even have access to a phone, let alone the Internet. All over Indian Country, too many people are dying because when someone has a heart attack or there is a fire, people must rely on runners to carry the call for help.

To put things in perspective, the U.S. Department of Commerce reported last year that about 94 percent of all U.S. households subscribe to telephone service. Rural American Indian households rank far below the national average, with only 76 percent having phones in their homes. On too many reservations, telephone subscriber rates fall under 50 percent.

After conducting field hearings and initiating two rulemaking proposals, the Federal Communications Commission (FCC) in Washington, D.C., is serious about encouraging

"I can't predict how fast we can move this, and I'm one of five commissioners." Tristani told *American Indian Report*. "But I know that everybody has an interest in having this done sooner rather than later."

The rulings can't come a moment too soon for Joe Red Cloud, utilities project coordinator for the Oglala Sioux Tribe at Pine Ridge Reservation in South Dakota. There, an 80 percent unemployment rate and the custom of clans living in small groups in often remote hamlets have combined to keep about 68 percent of reservation households without basic telephone service.

"We've been living like we're in the 30s and 40s," Red Cloud said in an interview. "Within a short period of time, we're going to leap into the mid-'90s and, in a few years, we'll be approaching the 21st Century." The reservation will still be technologically behind urban areas, he predicts, "but at least we'll be coming out of the technological dark ages." He believes that if universal service subsidies are available, wireless communications promise affordable access to voice phone service on remote parts of the reservation.

Pine Ridge, the second-largest reservation within the continental United States is currently served by three traditional wireline service providers. Of the three, Golden West is the largest, providing the tribe with its only Internet connection — which in recent months has suffered service interruptions that the company had not yet resolved, Red Cloud said.

The prospect of competing for universal service dollars has Golden West management —



FCC Commissioner Gloria Tristani.

competition through making universal service subsidies available to wireless and satellite telecommunications carriers to achieve wider access to telephone service for people living in remote sections of Indian Country.

FCC Commissioner Gloria Tristani said that she expects final rules to be published by late summer.

like other rural carriers that are designated eligible telecommunications carriers (ETCs) — worried about potential revenue losses.

"I had a sit down talk with Golden West," Red Cloud said. "They've invested a great deal of money into the communications infrastructure. They have a lot of fiber optic cable in Pine Ridge and larger villages, around our tribal schools and our college campuses. ... After looking at the map Golden provided, it was easy to see that the high speed end of service was superior. I congratulated them on their initiative and energy, but our problem isn't the infrastructure. Our problem is getting people to phones."

Studies and hearings have highlighted three fundamental reasons behind the lack of telephone service in Indian Country: the remoteness and difficult terrain of tribal lands with populations scattered over wide areas, difficulty controlling long distance toll charges, and the impact of joblessness.

Further obscuring the picture is a complicated legal maze for carriers doing business on reservations. And for many people, including tribal leaders, there is too little information about existing programs that could make hook-up and basic phone service from existing carriers affordable, especially when they take advantage of options to reduce or eliminate unwanted toll calls.

Today only traditional wireline telecommunications carriers are eligible for federal subsidies that can help offset the costs of providing telephone service to low-income residents throughout the United States. States designate eligible telecommunications carriers and some assert jurisdiction over tribal lands, but others do not.

Federal law stipulates that low-income households qualified for Medicaid are qualified to receive reduced prices for hookup and basic service. This program is subsidized through the Universal Service Fund, a national funding pool paid for by other telephone subscribers. One further glitch is that the FCC's rules limit the amount that incumbent telecommunications carriers may receive in universal service subsidies, keeping them far lower than the actual cost of providing modern services in rural areas.

It is likely that the FCC will make universal service subsidies available to wireless and satellite telecommunications companies by granting them status as eligible telecommunications carriers (ETCs) on rural tribal lands. The reason is simple. It's just too expensive to extend traditional wireline service to remote areas with few households able to afford it.

"Some areas are just too huge to serve with a wireline traditional system, and the Navajo reservation comes to mind as a good example," FCC Commissioner Tristani told *AIR*. "We're also looking and asking the question about whether universal service support or additional support should be targeted to these hard-to-reach areas," Tristani added. In addition, the FCC is considering relaxing its tower height restrictions for wireless carriers from its current 300 foot limit, and permitting stronger signals in rural areas.

During two hearings that the commission held in Indian Country last January and March, Tristani said she and her fellow commissioners learned "that there is not enough information out there about current programs — Lifeline and Link-up — which can really help people not only get a telephone, but stay on line. ... We were very surprised to hear that on some

country. And the Link-up program gives you money or helps you get the installation."

"That won't solve all the problems, by any means," Tristani said, "but that will help some, just to get that kind of information."

Not surprisingly, the proposal to grant ETC status to wireless and satellite communications companies has triggered resistance from existing providers who could face a loss of revenues if reservation households switch to wireless service because they can gain access to wider local calling areas.

Paul Shultz, director of communications and membership for the National Telephone Cooperative Association, said that 20 of NTCA's members serve Indian Country. "Long distance charges are a problem," he admitted. But state governments set boundaries for wireline carriers and the rural companies must petition state legislatures to change them.

Although the National Tribal Telecommunications Alliance (NTTA), a group that represents five tribally owned telecommunications companies, does not oppose granting ETC status to wireless providers that have entered into agreements with tribes, NTTA and individual tribes have warned the FCC it should independently consult with tribal leaders before granting

ETC status to companies that wish to sell their services to individual tribes. That means more than just relying on a letter from a tribal official.

FCC should contact tribal leaders to ensure "that both Indian tribes and the Commission have sufficient information to meet their respective public interest obligations concerning universal service on Indian lands," NTTA officials said.

J.D. Williams, general manager of the Cheyenne River Sioux Telephone Authority (CRST), said some rural telephone providers have made excuses for low telephone subscription rates. "The easy

way out was to say that Indians are very rural and don't want to keep up with technology." His experience shows him that tribal members want "class" services.

"People want connectivity. They want caller ID. They want paging. ... They want mobile telephone service, just like anybody else," he

RESERVATION TELEPHONE SERVICE

	Land (acres)	Reservation population	# homes w/o phones	#homes on reservation	% homes w/o phones
Confed. Tribes of Goshute Res. (UT)	160,000	120	38	52	73.0%
Crow Tribe (MT)	1,200,000	10,000	1,105	1,700	65.0%
The Navajo Nation (NM/AZ/UT/CO)	17,300,000	228,010	43,688	56,372	77.5%
Ft. Belknap Indian Community (MT)	697,617	3,300	309	701	44.0%
Kickapoo Tribe (KS)	3,614	975	40	100	40.0%
Leech Lake Band of Chippewa (MN)	602,880	8,669	650	1,300	50.0%
The Lovelock Paiute (NV)	22	212	33	45	73.0%
Northern Cheyenne Tribe (MT)	450,000	4,500	1,050	1,500	70.0%
Oglala Sioux Nation (SD)	896,000	32,100	4,100	6,000	68.0%
Red Lake Band of Chippewa (MN)	800,000	7,200	640	1,600	40.0%
Rocky Boy's Chippewa Cree (MT)	121,956	3,442	*	529	*
Rosebud Sioux Tribe (SD)	3,200,000	18,995	652	1,185	55.0%
Shoshone-Paiute (NV)	289,000	1,800	45	450	10.0%
Three Affiliated Tribes (ND)	93,700	4,600	900	1,400	64.0%
Turtle Mt. Band of Chippewa (ND)	140,000	8,000	1,500	4,800	35.0%
Winnebago Tribe (NB)	27,500	1,250	123	364	42.3%
TOTALS	25,982,289	333,173	54,873	78,098	
AVERAGE					53.8%

* Information pending tribal verification

Indian reservations, they really don't know about the programs. So there would be the case that a lot of people are actually in areas where it's not a question of getting a line into the house, but it's a question more of, 'we can't get the phone because we can't pay the \$17.'"

"Lifeline can give you up to a \$10.50 discount off your basic phone service."

Getting on the Net

THE BUREAU OF INDIAN Affairs has been working to bring the Internet and distance learning to its 187 schools and 30 tribally owned colleges through a project called Access Native America.

Jim Roubidoux, with the BIA Office of Indian Education Programs, manages the project out of the Albuquerque office.

"The charter says our goal is to provide Internet access to the schools and surrounding communities," Roubidoux said. That means year-round access. So far, 151 of the 187 schools have been cabled for local area networks and 102 of the schools have a "wide area network" through the Department of Interior's Internet server.

"Getting phone access is the biggest problem," Roubidoux said. "We have over 40 schools where we can't get land lines."

"There are some reservations in North and South Dakota where we've had circuits on order for two years," a good indication, he says, that they aren't likely to get them. A lot of the wire that was installed in Indian Country was put in place during the 1960s. Rural phone companies need new wire and switching hardware. They also must clean up wiring breaks between telephone poles, a labor intensive job requiring lots of bucket trucks and technicians.

The human ear can tolerate a lot of blurriness, he pointed out, but computer transmission requires clean lines and reamplification of the signal every three miles.

"The solution for data transmission is probably satellite," he said. "We're going to be paying in the neighborhood of \$2,000 a month for a satellite connection with 128 kb outbound and 512 kb inbound. That's in the neighborhood of a T-1 circuit which runs about \$1,500 to \$3,000 a month."

Roubidoux has noticed a big difference at schools already on the net. "I see a lot more enthusiasm, a lot more vibrance than before, and a lot more participation in science fairs."

gest issue is cost. CRST charges \$15.50 for basic service in towns and \$18 in the country, and gets Universal Service funds to help offset costs.

"Lower income people are demanding Link-up and Lifeline programs," he said.

Williams urges tribal governments to educate themselves about the pros and cons of various approaches.

"They need to really become aware of the need of people to have connectivity and what that means for future generations to have accessibility to the knowledge base of the world," he emphasized. "And from that point, they should move quickly to adopt tribal philosophy and policies to acquire that. That can be bought through teaming arrangements — working with a corporation or cooperative phone company, or an industry player that can work with them to provide the services."

The Navajo Nation's situation illustrates the challenges leaders face.

Citizens Communications, doing business as Navajo Communications, serves about 23,000 subscribers on the Navajo Nation, about 23 percent of the total households.

Despite the low subscriber rates, Citizen's told the FCC that all of its central office switches are digital, permitting subscribers services such as call forwarding, call waiting, voice mail and conference calling. The company also upgraded its services to BIA schools on the reservation but has been unable to upgrade its 911 service.

Aloa Stevens, director of external affairs for Citizens, told the FCC that tough federal and tribal requirements on right-of-way make it difficult and costly to extend service, even short distances. Stevens also said that theft and vandalism at remote equipment sites are "common and dramatically increases the cost of service." Special construction charges to hook up unserved households can cost consumers anywhere from



Drilling a hole for a power pole.

\$1,500 to \$157,000, depending on the length of the extension, he said.

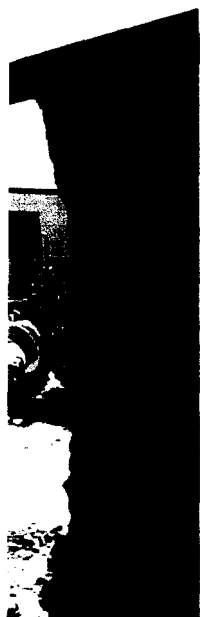
Despite qualifying for Lifeline and Link-up programs, such high connection costs place wireline phone service out of reach.

But Tico Charlee, director of communications and utilities for the Navajo Nation is dissatisfied with the company's level of service.

"They cannot provide any Internet access," he told AIR. "They do provide some wireless communications and are approved for ETC." But the company's seven-year payback requirement for installations translates into the company only being willing to go up to 1500 feet to add unserved homes to main lines, less than a quarter mile. In one instance he looked at, Charlee said a consumer with a home only 400 to 500 feet from the main cable was going to be charged \$3,000 to be hooked up.

In one instance, a consumer with a home only 400 to 500 feet from the main cable was going to be charged \$3,000 to be hooked up.

"We went back and had them redraw the whole thing," Charlee recalled. They found that "the left hand wasn't telling the right hand what was going on." Citizens' managers were then asked by the tribe "to look at what was going on," Charlee said. "They apologized and gave [the consumer] a month's free service."



The tribe also has begun "stepping in and forcing [the carrier] to work with Link-up and Lifeline applications," he said.

Because of the difficulty in assuring satisfactory telephone service to its members, the tribal government which oversees more than 17 million acres in three states, is considering a range of options, Charlee said. "We've looked at wireless, fiber, copper, satellite — a whole array, and we're going to have to interlink it all together," Charlee said. "That's a very, very big order."

Western Wireless, doing business as Cellular One, provides cell phone service to part but not all of the Navajo Nation, Charlee said, and there have been problems.

"Right-of-way is one of the biggest problems for cultural preservation," Charlee noted. "Cellular One put two towers up illegally and we made them take them down," he said.

"Towers pose a problem — we don't want a picket fence [effect]; we're trying to camouflage them to blend into the mountains." Dial tone from cellular phone services located in border towns frequently extends into reservation lands, he added. Tribal consumers sometimes buy a \$40 package, Charlee said, only to be socked with a \$300 phone bill for long-distance roaming charges.

Sovereignty is a huge issue. Some states assert sovereignty over the selection of eligible carriers serving Indian Country; others do not. Complicating the picture is the fact that wireless telecommunications have so far been regulated by the FCC, because airwave transmissions cannot stop at state or reservation boundaries.

In some cases, frequencies have been auctioned for reservation service without tribal governments ever being aware of it. Samuel N. Penney, chairman of the Nez Perce Tribal Executive Committee, said in a letter to the FCC. "Tribes need not only to be provided with information when a provider requests a license from the FCC, but with an opportunity to help shape the FCC's response to any request regarding service on their reservations."

Telecommunications companies that take the trouble to educate themselves about how tribes do business, stand a far better chance of working out mutually beneficial arrangements.

Charles W. Blackwell, the Chickasaw Nation's ambassador to the United States, has

been hired to provide cultural consulting services to Western Wireless, which does business as Cellular One. The company's service area covers 19 Western states, encompassing all or part of 70 reservations.

The company is lobbying the FCC to grant ETC status to wireless carriers in areas that are unserved or under-served. If they get it, wireline companies in those areas could be in real trouble, because cellular companies can offer wider local calling areas than wireline companies.

Blackwell sent survey forms to the tribes in Western Wireless' service area to assess the number of homes without phone service. Seventeen tribes responded. The percentage of homes reported without telephones ranged from 10 percent for the Shoshone-Paiute in Nevada to 78 percent for the Navajo Nation.

Western Wireless recently petitioned the FCC for ETC status with the Crow Tribe in Montana, with the tribe's assent, Blackwell said. The Crow, with a population of 10,000 on 1.2 million acres, estimate that 65 percent of their households are without phones. For the Crow, the question is simply affordable access to basic voice telephone service.

Western Wireless also is poised to work out a deal with the Pine Ridge Reservation, if it can get ETC status. "I was impressed with Western Wireless because they realized they

were going into a new market and they had hired a cultural consultant [Blackwell]," Joe Red Cloud told *AIR*.

"His father was a principal at one of our local elementary schools. Charles has a firsthand knowledge of the problems we're trying to surmount. ... They came and were completely open to any thoughts on how we think it ought to work and are respectful of the way we live our lives out here."

Western Wireless has promised that if it receives ETC status with tribal support, calls originating and ending within the reservation would be exempt from tolls and there would be unlimited access to local calls.

"That settles the vast bulk of my problem," Red Cloud said. With basic phone service, residents can reach their doctor at the hospital in Pine Ridge or schedule an appointment at a clinic, or get help in an emergency.

He recalled a recent tragedy where a small family was living in an older trailer home. "They had run out of money for their propane gas and were using a wood stove inside. They had no telephone service." There was an accident and the trailer caught on fire — and no one could call for help.

"Three people died in that fire and the house was destroyed," Red Cloud said. "I have promised myself that this is the last year that this will happen. There will be no more fatalities for lack of a phone."

Do It Yourself?

BEFORE THE TOHONO O'ODHAM TRIBE BOUGHT OUT US WEST'S EXchanges in 1987, there were only 390 telephone lines on the reservation. US West provided eight-party service and charged by the mile, recalls Chuck Wiese, general manager of the Tohono O'odham Utilities Authority.

"One of our foremen was on standby. His bill for dial tone was \$125 a month for eight-party service." Today, the tribal utility serves more than 3,500 telephone lines, with basic service priced at \$13.50.

The tribe added two remote offices, connecting them by fiber optic lines and then built out to all the major villages. There are 70 villages within a 4,500 square mile territory, roughly the size of Connecticut. Radio telephone service is available to the most remote customers.

The company also provides a local Internet service and high capacity lines to the nation's offices and schools, including T-1 connections which support high quality interactive video links to distance learning sites.

"We have not raised rates since we started the operation," he said. "We finance this through the Universal Service Fund. If it weren't for the Universal Service Fund, we would have a difficult time. You get your money from providing dial tone and you also charge long distance providers for switch access."

"Times are changing," Wiese commented, and "it takes a lot of money. We put in a new switch, and it's going to cost us \$1.7 million. We're also running fiber to Tucson to increase our capacity for the foreseeable future and that will cost about \$1.5 million. There's a lot of money involved in engineering, archeological and environmental site reviews."

One place to start looking for help is the Rural Utilities Service, an agency of the U.S. Department of Agriculture. RUS provides low-interest loans to rural co-ops to promote universal availability of telecommunications and information services.